

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: Acetaminophen – ASD-ADHD Products Liability  
Litigation**

Docket No. 22-md-3043 (DLC)

**This Document Relates To:** *All Cases*

**NOTICE OF PLAINTIFFS' RULE 702 MOTION  
TO EXCLUDE DEFENDANTS' EXPERT DR. WENDY CHUNG**

**PLEASE TAKE NOTICE** that, pursuant to Fed. R. Evid. 702, and upon the annexed Memorandum of Law, the Declaration of Ashley C. Keller, Esq., dated September 19, 2023, with all exhibits annexed thereto, and upon all prior pleadings and proceedings heretofore had herein, Plaintiffs, through their undersigned counsel, respectfully move this Court, before the Honorable Denise L. Cote at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Courtroom 18B, New York, New York 10007-1312, for an Order excluding Defendants' expert Wendy Chung, M.D., Ph.D.

Dated: September 19, 2023

Respectfully submitted,

**KELLER POSTMAN LLC**

/s/ Ashley C. Keller

Ashley C. Keller (IL Bar #1029118)\*

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